

Comments on Western Renewable Energy Information System (WREGIS)

From: Washington Energy Policy Division and Washington State University Energy Program

General comments:

The general design of the WREGIS database is excellent. We applaud the effort to collect sufficient information for verification and (initial) tracking of renewable generation, but not an excessive amount of information, which would make WREGIS overly complex and expensive. Relying on individual states (or other entities) to determine critical characteristics as the "weight", lifetime, and in-state generation requirement, of a REC is reasonable.

Proposed static plant information regarding fuel source:

The current proposal is to annually update plant (or generator) specific information regarding fuel source and percentage of natural gas augmentation (e.g. for landfill or sewage gas plants that may use some natural gas when needed). (Question: Do they do this to meet contract obligations for power that their "renewable" fuel source is not sufficient to meet?)

The problem with this approach is the implicit assumption that a plant is a producer of "renewable energy" just because it was intended to burn (or was burning at last check) gases from a decomposition process. In fact the plant might be burning 100% natural gas at some point in its operation. This could give rise to a situation where the most current information (almost a year old maybe) in the WREGIS system about plant X's *usual* fuel mix qualifies it (by somebody's definition for whatever purpose) as a producer of "renewable energy," when in fact, the plant isn't burning "renewable" fuel at all (at least some of the time).

Recommendation: the WREGIS system should track fuel source as part of the *dynamic* information that is tied to each certificate representing a MWh of electricity. Alternatively, since WREGIS is intended to track power that might meet a definition of "renewable," the system could require producers of power from combustibles to report to the WREGIS system only that percentage of their generation that can be attributed to burning fuels that might meet someone's definition of "renewable." WREGIS would then only generate certificates on that part of production from combustion that resulted from combustion of renewable fuels.

Proposed tracking of dynamic information regarding sale of unbundled electricity:

The sale of electricity that has been "unbundled" from RECs may have several impacts on the processes utilized by the State's of Washington or Oregon for calculating the yearly fuel mixes reported by utilities to their customers as part of these state's fuel mix disclosure (consumer labeling) programs.

When a utility makes a specific purchase of electricity from a generating facility that may have sold the RECs associated with the generation of that electricity, the fuel source for that power can no longer be considered to be the "renewable" from which the value associated with the RECs was derived.

When unbundled electricity is sold on the spot market, calculation of net system fuel mix, (the fuel mix attributed to utility purchases of electricity on the spot market) is affected.

Recommendation: sales of unbundled (no longer associated with the "green" attributes of its generation) electricity should be tracked by WREGIS.

Proposed collection of voluntary static information

The current plan is to collect voluntary information on;

1. Green-e eligibility,

2. Receipt of PTC,
3. Receipt of support of public benefits funds,
4. Whether generation facility receives emission allowances.

We feel that there might be an incentive for some generators to not report this information, and that the information could be of importance in complying with current and future state RPS programs.

Recommendation: to avoid misrepresentation, the above information should not be reported voluntarily.

Request for Comment on Emission Offset Tracking.

We feel that the WREGIS system should not focus on tracking emissions offsets at this time. Future development and expansion of the WREGIS system could incorporate emission offset tracking.

Request for Comment on Tracking Small Scale, Non-metered Generation Systems.

Small scale, non-metered generation systems will be of increasing importance and a reasonable effort should be made to incorporate these systems into WREGIS. However, the inclusion of these small renewable energy sources should not significantly delay the “launch” date of WREGIS.